Application No.: 09/899,829 Docket No.: 323328003US

REMARKS

Claims 1-39 and 58-72 are pending. Applicant is amending claims 1, 12, 23, 32, 58, 64, and 70 and canceling claims 40-49 and 51-57.

Applicant would like to thank the Examiner and his supervisor for their consideration during the interview of November 2, 2005. As discussed during the interview, applicant has amended the claims to clarify that the term "search engine" refers to any of a variety of well-known web search engines, such as Google. In addition, applicant has cancelled several claims to simplify the issues during prosecution of this application.

The Examiner has rejected claims 1-11 under 35 U.S.C. § 112, second paragraph. Applicant has amended the claims to address the Examiner's concern.

The Examiner has rejected claims 1-39 under 35 U.S.C. § 103(a) as being obvious in view of Voit by itself or in combination with Waites and/or Sitaraman. Applicant respectfully disagrees.

Voit describes mapping telephone numbers to IP addresses and mapping domain name to telephone numbers. Voit, however, does not describe that these mappings use any "intermediate identifiers." Rather, telephone numbers are directly mapped to IP addresses without any further mapping, and domain names are directly mapped to telephone numbers without any further mapping.

According to Voit, a domain name server maintains translation tables that map domain names to IP addresses and telephone numbers to IP addresses. (Voit, 9:64-10:8.) For example, one table may map "eric.voit@phone" to the IP address of Eric Voit, and another table may map "301-608-2908@phone" also to the IP address of Eric Voit. Thus, a person wanting to call Eric Voit can enter either "eric.voit@phone" or "301-608-2908@phone" to place the VoIP call. Voit further describes that the domain name server may include tables for "translating domain names directly into telephone numbers." (Voit, 10:18-20.)

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Claims 1-39 recite mapping that includes an "intermediate identifier" such as a "dynamic address name." Claims 1-11 and 23-31 recite mapping a "domain name" to a "dynamic address name" (i.e., a type of intermediate identifier) and then to an "address." Claims 12-22 recite mapping a "domain name" to an "intermediate identifier" and then to an "address." Claims 32-39 recite mapping a "parameter of a "uniform resource identifier" to a "dynamic address name" and then to an address.

Since Voit neither teaches nor suggests the use of any "intermediate identifier" as recited by these claims in the process of performing its translations, the Examiner takes the position that it would have been obvious to translate "the domain name into the intermediate identifier and translating the intermediate identifier into IP address for the purpose of enhancing the processing functions performed by the domain name server. (Office Action, July 1, 2005, p. 4.) Applicant respectfully disagrees. The Examiner has pointed to nothing in the prior art that provides a suggestion or a motivation to perform such a translation with an intermediate identifier. Rather, the Examiner is impermissibly relying on applicant's disclosure for the suggestion. Moreover, the Examiner provides no explanation of how the modification to Voit would "enchance" its processing functions. Voit already describes the "translation of names into routing addresses for establishing communication via public data network such as the Internet" that the Examiner suggests would be a benefit of the "enhancement." (Id.)

The Examiner has rejected claims 58-62 and 64-72 under 35 U.S.C. § 102(e) as being anticipated by West. Although applicant disagrees, applicant has amended these claims to make it clear that the term "search engine" refers to a web search engine that receives a query and identifies web pages that match the query (e.g., Google). In rejecting these claims, the Examiner takes the position that a traditional DNS server that receives a DNS resolution request is a search engine. Although applicant disagrees, applicant has amended the claims so that the term "search engine" clearly does not encompass a DNS server.

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The Examiner has rejected claim 63 under 35 U.S.C. § 102(e) as being anticipated by Zhang. Applicant respectfully disagrees.

Zhang describes a technique for locating a DNS server for processing DNS requests. (Zhang, 6:13-59.) In particular, if a DNS server cannot be located for a DNS request, then Zhang describes altering portions of the request and trying again. Eventually, if a DNS server cannot be located even after altering the request, then Zhang suggests forwarding the DNS request to a default DNS server. Once a DNS server is located, the domain name can be resolved to an IP address. Zhang does not discuss what happens when the domain name cannot be resolved to an IP address.

The forwarding of a DNS request to an alternate DNS server is not "sending to the client an address of an alternate server computer so that the client can access the alternate server computer in place of the server computer identified by the domain name" as recited by claim 63. In particular, the client does not access an alternate DNS server in place of the server identified by the domain name. Rather, the client accesses the alternate DNS server in an attempt to resolve the identified domain name to the IP address of the server identified by the domain name.

Based upon the above amendments and remarks, applicant respectfully requests reconsideration of this application and its early allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8548.

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Respectfully submitted,

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